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U. S. DISTRICT JUDGE

2012 DEC -6 AM 8:11

DATE

12-5-12

THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
Thomas Beggs / Brooks,
Plaintiff.

C/A No. 4:11-cv-03362-TLW-TEN

vs.
The South Carolina Department of
Corrections, et al
LEE Correctional Inst., et al
Richland County Public Defen-
ders Office, et al
Defendants

① MOTION FOR LEAVE TO FILE A SUPPLE-
MENTAL COMPLAINT; ② MOTION FOR PRES-
ERVATION OF EVIDENCE MATERIAL TO CAUSE
OF ACTION; ③ MOTION FOR SERVICE OF
PROCESS ON Corporations in General; ④
MOTION FOR LEAVE TO Conduct dis-
covery.

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HEREIN THE plaintiff in civil action No. 4:11-cv-03362-TLW,
motions uped the court for leave pertaining to the (4) listed motion re-
quests herein. THE plaintiff, pro se will attempt to address these
issues to establish "Good Cause" for the Courts destruction to Judge-
ment in favor of plaintiff pro se, As a matter of law.

HEREIN THE plaintiffs requests for leave to file a supplemental
complaint deals with a issue with one MAY. DEAN and one
LT. JANE DOE and one S.C.D.C. I/W that these three allegeded
that some type of security issue arose between me and
John DOE I/W one that i lack any knowledge of pertaining
to some allegeded argument etc., that lead John DOE I/W
to address some known issues to LT. JANE DOE, sponsor of
The Florence unit who referred to allegeded situations to MAY
DEAN, HEAD of Security Unit at L.C.I.

Breaks

on 08-01-2012, IN MAJ. DEAN, OFRE here at L.C.T. before
 LT. JANE DEE, and ONE CAPT. COMMANDER, THE plaintiff.
 was threatened and forced to sign protective custody papers
 concerning a incident he lacked knowledge of nor had any
 involvement in, that was brought forth by 'I/M JENNIE, who
 threw me in the situation because he wanted a room
 change because i ~~was~~ want talk to him at night when
 i'm trying to sleep and he want to worry me about his
 problems that he got himself in- to when i have my own
 problems that have been brought upon by others causing
 me additional stress and aggravation deal with and
 being around individuals with different personalities.
 that i don't know nor care to involve in my personal
 and or private life for the record. IT is upon my belief
 that the admin, here at L.C.T. and the staff that coordin-
 ates A.T.V, which is a substance abuse program that i took
 upon myself to be a part of to overcome my substance abuse
 issues and certain I think that help the staff coordinate
 programs or trying to document shunned-up uncollaterated
 incidents to get me kicked out of the A.T.V. program. MAJ.
 DEAN FORCE me on 08-01-2012, to sign P.C. papers saying
 that i did not fear for my life and that i did not what
 P.C, it is upon my belief that due to the status quo, or
 uncovering of this criminal and or civil conspiracy
 and or controversy and the fact that L.C.T. ~~are~~

Brooks

admin., security, medical, etc. has been made aware of my innocence and the ~~Richard~~ ~~county~~ parties attempt to force me to suffer the consequences of criminal acts of law enforcement etc., due to bad faith the incident report that is attached to the consent signed statement and form indicating that you do not fear for your life may be altered and swept out to address a more broader or over broader issue that was not the topic of the forced signing of this paperwork concerning a incident i had no knowledge of other than a lack of communication with Ila John Doe, all parties are defendants in CIA NO 4:11-cv-03362-TLW, and I ~~under~~ ~~went~~ the threat of being placed on lock-up during the month of Ramadan where i'm trying to fast as a Muslim without all the foolishness that has manifested at this ~~prison~~ prison, also were i have a up coming P.C.R., hearing that is possibly coming up ~~on~~ the 10th date of the week of Sept. 2012 and i dont have time to be writing the law l.a. board from lock-up and waiting 4 weeks for the material that i wish to view. In addition even in general population for the record the plaintiff is not getting adequate law library time to perfect suit pro se, and or ~~to~~ to assist P.C.R., attorney of avenues for grounds that i feel that petition should be attacked on.

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The State Dept. of Corrections may attempt to prejudice or premature judgment thru a Fed. Rul. C.V. P.R. Rule 12(b) motion etc, and the plaintiff asserts the right that he should have at least access to legal materials if prose, and adequate time to study these materials and the accommodations of supplies or instruments such as xeroxing copies of cases and statutes in his favor that may prevent a premature prejudice ruling in favor for defendants. The plaintiff is confused and he is unable to obtain a lawyer by normal means rather paid, pro bene, etc, the plaintiff lacks legal knowledge needed to address complicated deprivations of his civil right and these issues were brought upon him by defendants, where ~~relief~~ relief requested may be barred in a ~~premise~~ ^{genuine} issue at law. Where a court appointed attorney would be in plaintiff's best interest due to no fault of his own for his confinement within the penal institution at the S.C. Dept. of Corrections. ^{within} this paragraph I request that these additional issues or "preserved in this motion", added to this complaint and the "incident report" of the encounter ^{on motion} between 08-01-2012, ~~between~~ MAY. DEAN, etc. or preserved in this ~~motion~~ which includes any and all statements and or affidavits etc, or preserved etc. pursuant to SOUTH CAROLINA CODE ANN. §§ 19-21-70 supra, 17-27-150 supra. Plaintiff ^{believes} that this may be used for other reasons pertaining to the incident report etc. and ~~he~~ wishes disclosure etc.

Brooks S

HEREIN FOR THE RECORD THE plaintiff requests that the following information rather statements, orally stated, written, any and all physical evidence and or reports or documents etc., of records of Contraband ~~and~~ Contraband from inmates and or stored at "cell phones" (that or being used to coordinate criminal acts and or nuisance), "Drugs", "Weapons", and all incident reports, infractions of Inmate ~~and~~ offenders of disciplinary reports and hearing records of (B.C.D.C. 19-69) forms that have been in possession and or under the use and influence of drugs from plaintiff's arrival from 11-10-2012 thru the plaintiff also requests that the following B.C.D.C. forms be set forth dealing with above requests B.C.D.C. 19-29A, and any and all outside illegal charges which may have been served by the the Sheriff of LEE County with Civilian Violators trying to ~~bring~~ ^{smuggle} Contraband into the inst, by any and all means not to just direct the presence of Contraband in it's most harmful scope concerning it's on going presence and the consequences that people ^{may be} involved suffers for those involved. This includes staff ~~write-ups~~ write-ups on BCCDC 19-29A forms etc. who may have be fined for failure of a standard, duty and or special care of security awareness, action, and prevention etc., and or who may also still retain there positions. this also includes officers having been caught at admitting

BRICKS to

Inmates in moves and or bringing contraband in themselves to inmates to cell. For "Green dots", green dots or visa cards that have a 12 or 14 digit number that is giving to these items by friends and or family on the streets where these digit numbers or giving to the dealers of the contraband with whatever amount that ~~is~~ is placed on the Green dot cards for ~~graph~~ graph. The cell phones or the main and most used way to make easy this transaction and the cell phones also or used to coordinate with ~~the~~ individuals in society and or organizations to coordinate the movement to get the contraband over the rec. field fences to inmates who have home made keys to unlock rec. field doors, room doors of other inmates they wish to kill, beat up, rape, etc. when they evade security devices which is another SCDC 19-29A etc report request along with all institutional, departmental, security, administrative, and ~~and~~ ^{any} and all investigative agencies inside and outside of the Department of Corrections that have a record of any and all security breach that has been made from 11-10-2010 thru — which is material to the cause of action and should be set forth pursuant to S.C. Code Ann. §§§ 19-21-30, 19-21-40, 19-21-70. And where good cause exists pursuant to S.C. Code Ann. § 17-27-150 supra. Rule 11, S.C.R.C.P.

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Herein pursuant to S.C. Code Ann. § 15-9-210, the plaintiff requests due to safety concerns that the representative capacity of the South DOB I/M party to this Joinder be served upon a agent that is not connected with LEE C.I., as a matter of law due to safety concerns that may affect Plaintiff's safety, life, treatment concerns which could cause additional emotional distress if he is retaliated upon by the L/M population and the staff and or admin., who he is forced to be housed with, be around, abide to and or rely on pertaining to the admin, officers, and inmates.

Herein the plaintiff requests the full and or actual names and Identification numbers of all defendants rather employees and inmates of this prison. Joinder from all parties as defendants in this suit from the Richland County defendants too the LEE CORRECTIONAL Inst. defendants. This request is also directed at locations of businesses and or places where service can be served on individuals and groups of defendants to associate all parties and plaintiffs interest pertaining to the earliest conveniences pertaining to the service of process. Pursuant to S.C. Code Ann. § 17-27-150, Rule 71.1 of the South Carolina Rules of Civil Procedure, and on the grounds that good cause exists to allow this discovery to proceed.

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Herein Finally, the plaintiff, requests a special order from the courts to perpetrate telephone records from a establishment named "Pop's New York Pizza Wings AND Hoagies", that was requested of by plaintiff to the appointed attorney John Ruedas Barlow, Richland County public Defenders Office, Richland County Judicial Center, 1701 MAIN St., Celina, S.C. 29201, where he subatoged the previous subpoena # 2009954001154, thru Bell South # B5T09068325, that was Received on 03-06-2009 at the Subpoena Center located at 208 S. Akard 10th Floor Dallas, TX 75202 (214) 263-2137 by Ms. Karen Lervington, and or Ms. Jennette Smith, (214) 269-2300. which address the issue of trunk numbers etc., in the disclosure of an alleged phone call coming into Pop's N.Y. Pizza to order a pizza and Mozzarella sticks which could only be at call # 15 that came in from (803) 261-3830 at 22:10:03hrs and ended at 22:12:44hrs which would represent the same approx time on pizza receipt which would give the investigation a prime suspect and not a attempt to convince a jury and deceive a Judge concerning rather i had involvement in allegation thru the phone records of who owned this call in respects to the pizza receipt. where time derives from the receipt, location etc, things that have been asserted

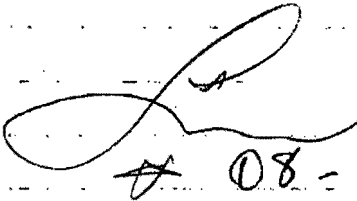
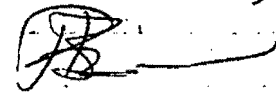
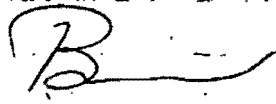
Brooks 9

to put me to this location at this specific time by proof of this document. The number (503) 261-3830 at call number 95 is a trunk number this same number represents the Carrier obviously and this number pops up on the telephone log when I was at work on the clock etc, and even after the arrest for this alleged incident where there would be no way I could have made the calls and or call. I have sent the telephone records in a prior ~~document~~ prima facie showing to the Court the date is unknown at this time and I need these records not only to prove my innocence but for the ^{proper} cause of the defendant in question of neglect of a ^{legal} matter entrusted upon him pursuant to DR 6-10(A) of the Code of Professional Responsibility to perfect claim against defendants in their on individual capacities as a matter of law pursuant to S.C. Code Ann. 17-27-150. Rule 71-1 of the S.C.R.C.P.

Finally, this motion is supported by the pleading in the Complaints and or Complaints in whole and part at C/A NO. 4:11-cv-03362-TLW and all supporting evidence of all prima facie showings of this genuine issue, before the Court and or thru all motions submitted etc, and all applicable statutes and case authority, ^{the} applicable, Rules of Civil procedure, and such other evidence and

authority as the Court may find it appropriate
to consider. ^{Brooks 10} appropriate

Respectfully,

  
08-03-2012